## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: BAIR HUGGER FORCED AIR WARMING DEVICES PRODUCTS LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

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This Document Relates To: *All Cases* 

DECLARATION OF GENEVIEVE M. ZIMMERMAN IN SUPPORT OF PLAINTIFFS' MOTION TO EXCLUDE THE OPINIONS AND TESTIMONY OF SAMSUN LAMPOTANG, PH.D.

- 1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesher & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
- 2. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Samsun Lampotang, Ph.D.
- 3. Attached hereto as Exhibit B is a true and correct copy of Exhibit B to the Expert Report of Samsun Lampotang, Ph.D. Materials Considered.
- 4. Attached hereto as Exhibit C are true and correct copies of excerpts from the Deposition of Samsun Lampotang, Ph.D., taken on August 11, 2017.
- 5. Attached hereto as Exhibit D is a true and correct copy of the expert report of Michael W. Buck.

I declare that the foregoing is true and correct under penalty of perjury pursuant to the laws of the State of Minnesota and the United States of America.

Dated: September 12, 2017 /s/ Genevieve M. Zimmerman

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Plaintiffs Co-Lead Counsel